

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

DIANE FULLER,

Plaintiff,

v

WEST BRANCH AUTOMOTIVE, INC.,

Defendant.

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)Case No: 1:10-cv-10787-TLL-CEB
)
)Judge: Thomas L. Ludington
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TERESA J. GORMAN (P 61001)
Attorney for Plaintiff
321 South Williams Street
Royal Oak, Michigan 48067
248/223-9922

DAVID A. WALLACE (P 24149)
Attorney for Defendant
P.O. Box 1966
Saginaw, Michigan 48605
989/790-0960

STIPULATED PROTECTIVE ORDER

NOW COMES the above named Plaintiff, DIANE FULLER, by and through her Attorney, TERESA J. GORMAN, and the above named Defendant, WEST BRANCH AUTOMOTIVE, INC., by and through its Attorney, DAVID A. WALLACE, and hereby Stipulate and Agree as follows:

1. That the Plaintiff has filed certain written discovery requests pursuant to Federal Rules of Civil Procedure seeking information including certain employment information and income information regarding employees of WEST BRANCH AUTOMOTIVE, INC. who are not parties to the instant litigation.

2. That this information is privileged and protected to the employees of WEST BRANCH AUTOMOTIVE, INC. and, these employees do not desire to waive that privilege or protection.

3. That to facilitate the production of this information subject to Defendant's objection and the right to the privacy and privilege of the employees, the parties hereby Stipulate to the entry of a Protective Order that includes the following understanding:

That there will be no disclosure outside of the four corners of this litigation by the Plaintiff and/or the Plaintiff's attorney of the identities of employees of WEST BRANCH AUTOMOTIVE, INC., information regarding their earnings or income, employment status, job duties, job performance or other any personal or employment related information.

4. Plaintiff and Defendant hereby agree to be governed by this Protective Order.

5. That, upon the conclusion of this litigation documents or information in any form whatsoever regarding employees of WEST BRANCH AUTOMOTIVE, INC. shall be returned to defense counsel of record and the obligations relating to non-disclosure shall be forever binding.

s/Thomas L. Ludington
THOMAS L. LUDINGTON
United States District Judge

Dated: June 18, 2010

APPROVED AS FORM:

/s/ DAVID A. WALLACE
DAVID A. WALLACE (P 24149)
Attorney for Defendant
Date: June 15, 2010

/s/ TERESA J. GORMAN
TERESA J. GORMAN (P 61001)
Attorney for Plaintiff

PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing order was served upon each attorney or party of record herein by electronic means or first class U.S. mail on June 18, 2010.

s/Deborah J. Goltz for Tracy A. Jacobs
TRACY A. JACOBS